

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JAN 18 2006

PUBLIC SERVICE  
COMMISSION

In the Matter of:

GENERAL ADJUSTMENTS IN ELECTRIC  
RATES OF KENTUCKY POWER COMPANY

CASE NO. 2005-00341

**KENTUCKY POWER COMPANY'S  
FIRST SET OF DATA REQUESTS TO  
KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION**

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence, investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number or code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.

7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.

### INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Power Company. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.

7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

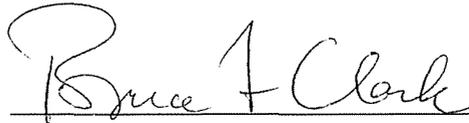
**JAMES W. FREEMAN**

1. Please reference Freeman testimony at p. 2. Is it Mr. Freeman's understanding that the current CATV rates were calculated using the Company's costs prior to October 12, 1984 (the date of the Commission's Order)?
2. Please reference Freeman testimony at p. 6. Mr. Freeman discusses the Company's 1991 proposed increase in the CATV rates.
  - (a) Does Mr. Freeman take exception to the 1991 CATV rate calculations?
  - (b) If so, what are the exceptions?
3. Would you agree that the Handy-Whitman cost trends of electric utility construction in the South Atlantic region, distribution plant pole, towers and fixtures indices are as follows:

1984 – 230  
1990 – 259  
2005 – 374

If the average investment in pole was \$275.89 in 1990 and \$387.51 in 1998, would you agree that this represents an average 4.3% per year increase (Freeman Exhibit 2).

4. Please reference Freeman testimony at p. 3, question 6. Please provide an explanation of your understanding of what comprises "Capital Leases" that were removed from "Total Utility Plant."
5. Please reference Freeman testimony at pp. 7-8, question 8. The existing two-user pole rate of \$4.97/pole/year, and three-user pole rate of \$5.53. Please explain why your recommended increase to \$6.47, and a rate decrease to \$4.02, respectively, is a reasonable reflection of material and inflationary cost increases.



Bruce F. Clark  
Judith A. Villines  
Mark R. Overstreet  
STITES & HARBISON, PLLC  
421 West Main Street  
P.O. Box 634  
Frankfort, KY 40602-0634  
Telephone: (502) 223-3477  
COUNSEL FOR KENTUCKY POWER  
COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served via e-mail and U.S. Mail, upon:

David F. Boehm Michael L. Kurtz Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 <a href="mailto:KIUC@BKLLawfirm.com">KIUC@BKLLawfirm.com</a>	Elizabeth E. Blackford Dennis Howard II Kentucky Attorney General's Office 1024 Capital Center Drive, Suite 200 Frankfort, Kentucky 40601-8204 <a href="mailto:betsy.blackford@ag.ky.gov">betsy.blackford@ag.ky.gov</a>
Richard G. Raff Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602-0615 <a href="mailto:rgraff@ky.gov">rgraff@ky.gov</a>	Joe F. Childers 201 West Short Street Suite 310 Lexington, Kentucky 40507 <a href="mailto:childerslawbr@yahoo.com">childerslawbr@yahoo.com</a>
Gardner F. Gillespie Hogan & Hartson L.L.P. 555 Thirteenth Street, N.W. Washington, D.C. 20004-1109 <a href="mailto:gfgillespie@hhlaw.com">gfgillespie@hhlaw.com</a>	Frank F. Chuppe Wyatt, Tarrant & Combs LLP 500 West Jefferson Street, Suite 2800 Louisville, Kentucky 40202-2898 <a href="mailto:fchuppe@wyattfirm.com">fchuppe@wyattfirm.com</a>

on this the 18th day of January, 2006.



Bruce F. Clark